

except through the production of evidence thereof in Defendant Comcast's sole possession and control.

PRAYER FOR RELIEF

142. WHEREFORE, Progme prays for the following relief:

- a. A judgment in favor of Progme that Defendant Comcast has infringed, directly, literally and/or under the doctrine of equivalents, at least one claim of the '425 Patent;
- b. A permanent injunction enjoining Defendant Comcast and its officers, directors, agents, servants, employees, affiliates, divisions, branches, subsidiaries, parents, and all others acting in concert or privity with any of them from infringing the '425 Patent;
- c. Award to Progme the damages to which it is entitled by law and under 35 U.S.C. § 284 for Defendant Comcast's past infringement and any continuing or future infringement up until the date Defendant Comcast is finally and permanently enjoined from further infringement, including both compensatory damages and treble damages for willful infringement;
- d. A finding that this is an "exceptional action" and a judgment and order requiring Defendant Comcast to pay the costs of this action (including all disbursements) as well as attorneys' fees as provided by 35 U.S.C. § 285;
- e. Award to Progme pre-judgment and post-judgment interest on its damages and